

Message

From: Budroe, Thomas [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=079D721E6CF849D4AC2E621F5E22B5FD-BUDROE, THOMAS]
Sent: 5/8/2019 7:27:38 PM
To: Mcpherson, Benjamin J (DEC) [benjamin.mcpherson@dec.ny.gov]
CC: Lisichenko, Peter [lisichenko.peter@epa.gov]; Staniszewski, Chad (DEC) [chad.staniszewski@dec.ny.gov]; Reuben, Peter A (DEC) [peter.reuben@dec.ny.gov]
Subject: RE: TCC - Draft Site 108 Tank Work Plan

Ben,

Thanks for your comments, they were helpful. Pete and I agree that the work plan was severely lacking in detail. We have responded to Honeywell with our comments and requested that a revised draft be submitted to EPA by May 24, 2019.

Thanks again, Tom

From: Mcpherson, Benjamin J (DEC) <benjamin.mcpherson@dec.ny.gov>
Sent: Friday, May 03, 2019 1:58 PM
To: Budroe, Thomas <Budroe.Thomas@epa.gov>
Cc: Lisichenko, Peter <lisichenko.peter@epa.gov>; Staniszewski, Chad (DEC) <chad.staniszewski@dec.ny.gov>; Reuben, Peter A (DEC) <peter.reuben@dec.ny.gov>
Subject: RE: TCC - Draft Site 108 Tank Work Plan

Tom,

It does not look like Parsons put much detail into this work plan. Regardless, I have some comments on the work plan:

- 1) Section 3.5, Community Air Monitoring: since this work will be on the State Superfund site, the DOH's Community Air Monitoring Plan (CAMP) requirements are applicable. I have attached the generic CAMP from DER-10 for your reference;
- 2) Section 3.6, Asbestos: if Parsons is not aware, NYS Department of Labor may require review/approval of their asbestos abatement plan;
- 3) Section 4.3, Contaminated Water: if the contaminated water from inside the tanks or decontamination activities contain the hazardous waste constituents for coal tar waste, then the water would be a listed hazardous waste. Such wastewater requires treatment prior to discharge to the Town's sewer (or other discharge point regulated by the Clean Water Act) or off-site disposal at a permitted facility;
- 4) Section 5.0, Infiltration: it does not appear that Honeywell is proposing to remove the tar surrounding/below the tanks within the berms. Given this, DEC would recommend leaving the ground surface within the berms in a condition that will limit infiltration of precipitation through the remaining coal tar; and
- 5) Section 6.0, Disposal Documents: please ensure that all manifests, bills of lading, and other disposal documentation are included in the summary report.

Let me know if you have any questions, or would like to discuss further.

Thanks,

Ben

Benjamin McPherson, P.E.

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From: Budroe, Thomas <Budroe.Thomas@epa.gov>
Sent: Wednesday, May 01, 2019 8:59 AM
To: Reuben, Peter A (DEC) <peter.reuben@dec.ny.gov>
Cc: Lisichenko, Peter <lisichenko.peter@epa.gov>; Mcpherson, Benjamin J (DEC) <benjamin.mcpherson@dec.ny.gov>
Subject: TCC - Draft Site 108 Tank Work Plan

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Pete,

As per your request the draft work plan is attached. Please be aware that EPA has not yet provided comments to the PRP regarding this document. Also, since this document has not been officially reviewed yet by EPA, please restrict the circulation of this document.

Thanks, Tom